



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

George A. Dalley, Treasurer  
National Leadership PAC  
2100 Pennsylvania Ave., NW, Suite 400  
Washington, DC 20037

Identification Number: C00302588

MAY 3 2000

Reference: Year End Report (7/1/99-12/31/99)

Dear Mr. Dalley:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your calculations for Lines 11(a)(i) and 11(a)(ii), Column B appear to be incorrect. FEC calculations disclose these amounts to be \$149,600 and \$1,290, respectively. Please provide the corrected totals on the Detailed Summary Page.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the

referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-You have received a contribution from The Ickes and Enright Group, which appears to be an unincorporated proprietorship or partnership. Generally, these types of contributions are to be attributed to each person based on their percentage of ownership in the firm. Each person who has contributed in excess of \$200 since January 1 should be identified by name, address, occupation, name of employer, amount of contribution, and aggregate total on Schedule A. 11 CFR §110.1(k) Please amend your report by providing the omitted information.

-Please amend Schedule A supporting Line 11(c) by providing the full name for each contribution received from a political committee. 11 CFR §104.3(a)(4)(ii) and (iii)(B)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports

Analysis Division). My local number is (202) 694-1130.

Sincerely,

*Andrea Wilkens*

Andrea Wilkens  
Senior Reports Analyst  
Reports Analysis Division

## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE 2 OF 7  
FOR LINE NUMBER  
11(c)

Any information copied from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

## NAME OF COMMITTEE (In Full)

National Leadership PAC

<b>A. Full Name, Mailing Address and Zip Code</b> CWA COPE Attn: Morton Bahr 501 3rd Street N.W. Washington, DC 20001- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date -&gt;</b>	<b>Date (month, day, year)</b> 12/22/199	<b>Amount of Each Receipt this Period</b> \$5000.00
<b>B. Full Name, Mailing Address and Zip Code</b> Chevy Chase Bank FSB PAC 8401 Connecticut Ave. Chevy Chase, MD 20815- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date -&gt;</b>	<b>Date (month, day, year)</b> 12/22/199	<b>Amount of Each Receipt this Period</b> \$1000.00
<b>C. Full Name, Mailing Address and Zip Code</b> Committee on Political Education, AFL-CI Attn: Steve Rosenthal 815 16th St, NW Washington, DC 20006- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date -&gt;</b>	<b>Date (month, day, year)</b> 12/20/199	<b>Amount of Each Receipt this Period</b> \$5000.00
<b>D. Full Name, Mailing Address and Zip Code</b> Concerned Citizens for Healthcare PAC Attn: Spencer Foreman, MD 2 Anne's Wood Lane Mount Kisco, NY 10549- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date -&gt;</b>	<b>Date (month, day, year)</b> 10/04/199	<b>Amount of Each Receipt this Period</b> \$500.00
<b>E. Full Name, Mailing Address and Zip Code</b> Continuum Action PAC For Health, Inc. 290 3rd Avenue New York, NY 10010- Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date -&gt;</b>	<b>Date (month, day, year)</b> 10/22/199	<b>Amount of Each Receipt this Period</b> \$3000.00
<b>F. Full Name, Mailing Address and Zip Code</b> Direct Selling Association Attn: Joseph Mariano 1666 K Street NW--Suite 1010 Washington, DC 20002-808 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date -&gt;</b>	<b>Date (month, day, year)</b> 12/22/199	<b>Amount of Each Receipt this Period</b> \$1000.00
<b>G. Full Name, Mailing Address and Zip Code</b> ELA Lease PAC 4301 N. Fairfax Drive, #550 Arlington, VA 22203-1608 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<b>Name of Employer</b>  <b>Occupation</b>  <b>Aggregate Year-to-Date -&gt;</b>	<b>Date (month, day, year)</b> 12/22/199	<b>Amount of Each Receipt this Period</b> \$1000.00

SUBTOTAL of Receipts This Page (optional)

\$16500.00

TOTAL This Period (last page this line number only)

